REMARKS

Claims 1-12, 16-24 and 28-31 are pending. The Examiner's reconsideration of the rejections is respectfully requested in view of the amendments and remarks.

Canadian Patent No. 1,338,423, referenced in the Information Disclosure Statement mailed April 30, 2004, has been rejected as being illegible. A copy of the patent is enclosed herewith in a Supplemental Information Disclosure Statement. Applicants note that in such cases were a *bona fide* is made to comply with the content requirements of 37 CFR 1.98, but part of the required content is inadvertently omitted, additional time may be given to enable full compliance. Therefore, Applicants respectfully request consideration of the reference without payment of additional fees.

Claims 25-27 have been objected to under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention.

Claims 25-27 have been cancelled.

Claims 1, 3-8, 13-15, and 28-30 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Troyansky et al. (US Application No. 2003/0190054) in view of Lemay et al. ("Laura Lemay's Web Workshop Creating Commercial Web Pages", hereinafter Lemay, Sams.net, 1996, pp.110-115). The Examiner stated essentially that the combined teachings of Troyansky and Lemay teach or suggest all the limitations of claims 1, 3-8, 13-15, and 28-30.

Claims 1 and 28 claim, *inter alia*, "providing to the client a media file corresponding to a dynamic assembly image tag of the HTML document, wherein the dynamic assembly image tag references textual content, wherein providing the media file comprises, obtaining, at the server, the textual content referenced by the dynamic assembly image tag, converting,

at the server, the textual content referenced by the dynamic assembly image tag to the media file, and providing the media file to the client."

Troyansky teaches a system and method for providing uniquely marked copies of data content via digital watermarks (see Abstract). Troyansky does not teach or suggest "providing to the client a media file corresponding to a dynamic assembly image tag of the HTML document, wherein the dynamic assembly image tag references textual content" as claimed in claims 1 and 28. Troyansky combines a template with an original frame (see Figure 10, box 171 and paragraph [0137]). The combination of template and original frame does not change the format of the original content. For example, an original frame in MPEP 4 format will still be in MPEG 4 format after a combination with a template. Thus, Troyansky does not teach or suggest "providing to the client a media file corresponding to a dynamic assembly image tag of the HTML document, wherein the dynamic assembly image tag references textual content" as claimed in claims 1 and 28. Therefore, Troyansky fails to teach or suggest all the limitations of claims 1 and 28.

Lemay teaches a tag referencing an image, such as <IMG SRC="abbacov.gif"> (see page 112, line 20). Lemay does not teach or suggest, "providing to the client a media file corresponding to a dynamic assembly image tag of the HTML document, wherein the dynamic assembly image tag references textual content" as claimed in claims 1 and 28. The image tag taught by Lemay references an image. The dynamic assembly image tag references textual content to be converted into a media file, essentially as claimed in claims 1 and 28. Thus, Lemay does not teach or suggest "providing to the client a media file corresponding to a dynamic assembly image tag of the HTML document, wherein the

dynamic assembly image tag references textual content." Therefore, Lemay fails to cure the deficiencies of Troyansky.

The combined teachings of Troyansky and Lemay fail to teach or suggest "providing to the client a media file corresponding to a dynamic assembly image tag of the HTML document, wherein the dynamic assembly image tag references textual content" as claimed in claims 1 and 28.

Claims 3-8 depend from claim 1. Claims 29 and 30 depend from claim 28. The dependent claims are believed to be allowable for at least the reasons given for claims 1 and 28. Claims 13-15 have been cancelled. At least claim 7 is believed to be allowable for additional reasons.

Claim 7 claims, *inter alia*, "compressing the media file according to a compression preference stored on the server."

Troyansky teaches lossy compression algorithms (see paragraph [0004]). Troyansky does not teach or suggest, "compressing the media file according to a compression preference stored on the server" as claimed in claim 7. Troyansky merely teaches that a digital watermark must be robust enough to withstand changes to a file, such as reductions from lossy compression algorithms. Nowhere does Troyansky teach or suggest that a media file is compressed according to a compression preference stored on a server. Therefore, Troyansky fails to teach or suggest all the limitations of claim 7.

Lemay teaches layouts for online catalogs (see Chapter Title). Lemay does not teach or suggest, "compressing the media file according to a compression preference stored on the server" as claimed in claim 7. Lemay does not teach or suggest compression, much less that a media file is compressed according to a compression preference stored on a server,

essentially as claimed in claim 7. Therefore, Lemay fails to cure the deficiencies of Troyansky.

The Examiner's reconsideration of the rejection is respectfully requested.

Claim 9 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Troyansky in view of Lemay, and further in view of "Using Netscape, The User-Friendly Reference", Ernst, W., hereinafter Netscape, QUE, 1995, pp. 324-327. The Examiner stated essentially that the combined teachings of Troyansky, Lemay and Netscape teach or suggest all the teachings of claim 9.

Claim 9 depends from claim 1. Claim 9 is believed to be allowable for at least the reasons given for claim 1. Reconsideration of the rejection is respectfully requested.

Claim 2 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Troyansky in view of Lemay, and further in view of Davis et al. (U.S. Application No. 2004/0037449). The Examiner stated essentially that the combined teachings of Troyansky, Lemay and Davis teach or suggest all the teachings of claim 2.

Claim 2 depends from claim 1. Claim 2 is believed to be allowable for at least the reasons given for claim 1. Reconsideration of the rejection is respectfully requested.

Claims 10-12 and 31 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Troyansky in view of Lemay, and further in view of "Adobe PageMill 2.0 Handbook", Lewis, R., hereinafter PageMill, Hayden Books, 1996, pp. 138-143. The Examiner stated essentially that the combined teachings of Troyansky, Lemay and PageMill teach or suggest all the teachings of claims 10-12 and 31.

Claims 10-12 depend from claim 1. Claim 31 depends from claim 28. The dependent claims are believed to be allowable for at least the reasons given for claims 1 and 28. At least claim 31 is believed to be allowable for additional reasons.

Claim 31 claims, *inter alia*, "generating an image map corresponding to the image file, according to a mapping preference stored on the server."

Troyansky teaches a system and method for providing uniquely marked copies of data content via digital watermarks (see Abstract). Troyansky does not teach or suggest, "generating an image map corresponding to the image file, according to a mapping preference stored on the server" as claimed in claim 31. As suggested in the Office Action, Troyansky fails to explicitly disclose: generating an image map corresponding to the image file, according to a mapping preference. Therefore, Troyansky fails to teach or suggest all the limitations of claim 31.

Lemay teaches layouts for online catalogs (see Chapter Title). Lemay does not teach or suggest, "generating an image map corresponding to the image file, according to a mapping preference stored on the server" as claimed in claim 31. Lemay teaches basic web layouts including images. Lemay does not teach or suggest image maps. Therefore, Lemay fails to cure the deficiencies of Troyansky.

PageMill teaches image hotspots linking to another URL (see page 139). PageMill does not teach or suggest "generating an image map corresponding to the image file, according to a mapping preference stored on the server" as claimed in claim 31. PageMill teaches that hotspots are manually drawn on an image. A manually drawn hotspot is not generated according to a stored mapping preference. PageMill does not teach a mapping preference, much less, "generating an image map corresponding to the image file, according

to a mapping preference stored on the server" as claimed in claim 31. Therefore, PageMill fails to cure the deficiencies of Troyansky and Lemay.

The combined teachings of Troyansky, Lemay and PageMill fail to teach or suggest all the limitations of claim 31.

Reconsideration of the rejection is respectfully requested.

Claims 16-20 and 22-23 have been rejected under 35 U.S.C. 103(a) as being unpatentable over Troyansky in view of Lemay, and further in view of Truong (U.S. Patent No. 6,151,609). The Examiner stated essentially that the combined teachings of Troyansky, Lemay and Truong teach or suggest all the teachings of claims 16-20 and 22-23.

Claim 16 claims, *inter alia*, "converting, automatically by the server, the content in text format to content in the image format according to the content creation preference; and providing the content in the image format to the client."

Troyansky teaches adding a watermark to data, video, audio, or other multimedia content (see paragraph [0109]). Troyansky does not teach or suggest "converting, automatically by the server, the content in text format to content in the image format according to the content creation preference" as claimed in claim 16. Troyansky embeds an appropriate watermark into multimedia content. Troyansky does not teach or suggest embedding a watermark into textual content, much less converting content in text format to content in an image format, essentially as claimed in claim 16. Troyansky fails to teach or suggest processing textual content. Therefore, Troyansky fails to teach or suggest all the limitations of claim 16.

Lemay teaches a web page including an image (see 111). Lemay does not teach or suggest "converting, automatically by the server, the content in text format to content in the image format according to the content creation preference" as claimed in claim 16. Lemay

merely teaches a basic layout of a web page. Lemay does not teach any conversion of content. Therefore, Lemay fails to cure the deficiencies of Troyansky.

Truong teaches an editor for remotely editing files on a remote Internet server (see Abstract). Truong does not teach or suggest "converting, automatically by the server, the content in text format to content in the image format according to the content creation preference" as claimed in claim 16. Truong teaches editing a file. Nowhere does Truong teach or suggest converting text content into image content. Therefore, Truong fails to cure the deficiencies of Troyansky and Lemay.

Therefore, the combined teachings of Troyansky, Lemay and Truong fail to teach or suggest, "converting, automatically by the server, the content in text format to content in the image format according to the content creation preference" as claimed in claim 16.

Claims 17-20, 22 and 23 depend from claim 16. The dependent claims are believed to be allowable for at least the reasons given for claim 16. At least claim 20 is believed to be allowable for additional reasons.

Claim 20 claims, *inter alia*, "compressing the watermarked image according to a compression preference stored on the server."

Claim 20 is believed to be allowable over the combination of Troyansky and Lemay for at least the reasons given for claim 7 above.

Truong teaches a remote editor system (see Abstract). Truong fails to teach or suggest "compressing the watermarked image according to a compression preference stored on the server" as claimed in claim 20. Truong teaches a system and method for editing files. Truong does not teach or suggest image compression, much less "compressing the watermarked image

according to a compression preference stored on the server" as claimed in claim 20. Therefore, Truong fails to cure the deficiencies of Troyansky and Lemay.

Therefore, the combined teachings of Troyansky, Lemay and Truong fail to teach or suggest all the limitations of claim 20.

The Examiner's reconsideration of the rejection is respectfully requested.

Claim 21 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Troyansky in view of Lemay, and further in view of Truong, and further in view of PageMill. The Examiner stated essentially that the combined teachings of Troyansky, Lemay, Truong and PageMill teach or suggest all the teachings of claim 21.

Claim 21 depends from claim 16. Claim 21 is believed to be allowable for at least the reasons given for claim 16. Claim 21 is believed to be allowable for additional reasons.

Claim 21 claims, *inter alia*, "generating an image map according to a mapping preference, wherein the image map relates selectable spatial display coordinates to external document identifiers."

Claim 21 is believed to be allowable over the combined teachings of Troyansky, Lemay and PageMill for at least the reasons given for claim 31.

With respect to Truong, Truong teaches a remote editor system (see Abstract). Truong fails to teach or suggest "generating an image map according to a mapping preference" as claimed in claim 21. Truong teaches a system and method for editing files. Nowhere does Truong teach or suggest generating an image map according to a mapping preference as claimed in claim 31. Therefore, Truong fails to cure the deficiencies of Troyansky, Lemay and PageMill.

The combined teachings of Troyansky, Lemay, PageMill and Truong fail to teach or suggest "generating an image map according to a mapping preference" as claimed in claim 21.

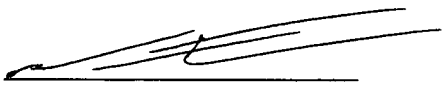
The Examiner's reconsideration of the rejection is respectfully requested.

Claim 24 has been rejected under 35 U.S.C. 103(a) as being unpatentable over Troyansky in view of Lemay, and further in view of Truong, and further in view of Minematsu (U.S. Patent No. 6,700,993). The Examiner stated essentially that the combined teachings of Troyansky, Lemay, Truong and Minematsu teach or suggest all the teachings of claim 24.

Claim 24 depends from claim 16. Claim 24 is believed to be allowable for at least the reasons given for claim 16. The Examiner's reconsideration of the rejection is respectfully requested.

For the forgoing reasons, the application, including claims 1-12, 16-24 and 28-31, is believed to be in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,

By: 

Nathaniel T. Wallace
Reg. No. 48,909
Attorney for Applicant(s)

Mailing Address:
F. CHAU & ASSOCIATES, LLC
130 Woodbury Road
Woodbury, New York 11797
TEL: (516) 692-8888
FAX: (516) 692-8889